

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

INTERFOCUS INC., a California  
Corporation

Plaintiff,

v.

HIBOBI TECHNOLOGY LIMITED, A  
Hong Kong Limited Liability Company,

Defendant.

Case No.: 1:22-cv-02259

**DECLARATION OF JENNY HOUSTON IN SUPPORT OF PLAINTIFF'S REPLY TO  
DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR PRELIMINARY  
INJUNCTION, TO EXPEDITE THE PRELIMINARY INJUNCTION HEARING, AND  
TO EXTEND THE OCTOBER 4, 2022 TEMPORARY RESTRAINING ORDER**

**DECLARATION OF JENNY HOUSTON**

I, Jenny Houston, declare and state as follows:

1. This declaration is based upon my personal knowledge of the facts stated herein or on the business records that were made at the time or in the regular course of business. If called as a witness, I could and would testify to the statements made herein.

2. I am a legal assistant working for the law firm Rimon P.C., counsel of record for InterFocus, Inc. herein.

3. I work and live in Roseville, California. I have been a legal assistant for 33 years.

4. I searched the World Intellectual Property Organization database and found a Hibobi trademark listed for various countries. Among them, the US trademark is listed under Hibobi Technology Limited and Hangzhou Hibaby Technology Co., Ltd., the two Defendants listed in Schedule A of the Complaint. See **Exhibit 1**, Lines. 30-49, 57 and 60.

5. Attached as **Exhibits 2** and **3** are true and correct copies of notices sent pursuant to the Digital Millennium Copyright Act on October 11, 2022 to counsel for Apple, Inc. and on October 13, 2022 to Aramex.

6. On October 17, 2022, I searched Hibobi.com's website and found several images matching the infringing images from the Declaration of Robert Rosenblum (Dkt. #10-22 thru 10-174) ("**Rosenblum Declaration**") in support of the Motion for TRO. I was able to preserve the **Exhibits 4B and 4C**, which show the same image as the second image of **Exhibit 4A**, which is one of the original photo submitted to the copyright office for an InterFocus product. **Exhibit 4A** is a copy of Exhibit 1B, which was filed under seal of the original Rosenblum Declaration (Dkt No. 10-24).

7. On October 25, 2022, I searched Hibobi.com's website and found additional

images that are identical to InterFocus' copyrighted images.

8. Interfocus Copyright Registration # VA0002283150 (Copyright certificate of registration attached as **Exhibit 5A**) is related to InterFocus' PatPat product #17359621. InterFocus registered ten images and Defendants copied all of them for this product. For simplicity, reproductions of three of the deposit copies for this Copyright registration are attached as **Exhibit 5B**. True and correct copies of the three matching images I captured on October 22, 2022 in Hibobi's website are included as **Exhibit 5C**.

9. On October 25, 2022, Defendants filed their response (Dkt. 33) to Plaintiff's Motion to Expedite (Dkt. 26). On the same day, around and after the time Defendants filed their response, I searched and found that InterFocus' copyrighted images continued to be present on the Hibobi.com website. For example, InterFocus submitted an application for copyright registration, Case No. 1-11854677161. **Exhibit 6B** is a copy of the original photo submitted to Copyright office as a deposit copy for that application. **Exhibit 6C** is a copy of Hibobi's website, captured by Rimon using Page Vault system on October 26, 2022, which showed an image identical to Exhibit 6B.

10. On October 27, 2022, I became aware that Hibobi Technology Limited ("Hibobi") maintains another website: [www.Babiesclotheswholesale.com](http://www.Babiesclotheswholesale.com). See the "About Us" section in the **Exhibit 7** (the "Wholesale Website") where the bottom of the page shows Hibobi Technology Limited as the owner/operator of the website. I searched this website and found several new images that are identical to InterFocus' copyrighted images. See two examples described in detail in paragraphs 11 and 12 below.

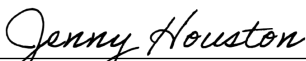
11. Attached is a true and correct copy of a screenshot (**Exhibit 8C**) of the Wholesale Website showing images that are identical to Interfocus' copyrighted images (Copyright

Registration # VAu001404114). Interfocus' Copyright Certificate is attached as **Exhibit 8A**. A true and correct copy of a screenshot from InterFocus' website showing PatPat product #17273247, which is protected by this copyright registration, is attached as **Exhibit 8B**. This product is also identical to the product depicted in Exhibits 7B to 7D, which were filed under seal, of Rosenblum Declaration, and the main images shown on the Wholesale website is identical to one of the image on InterFocus' website.

12. Attached is a true and correct copy of a screenshot of the Wholesale Website showing images that are identical to images in Interfocus Copyright Registration # VA0002289507 (Certificate attached as **Exhibit 9A**) and depicting InterFocus' PatPat product # 17258714 (currently off-shelf). **Exhibit 9B** is a copy of the original deposit copy photo submitted to the Copyright office. **Exhibit 9C** is a true and correct copy of the screenshot of image on the Wholesale website [www.Babiesclotheswholesale.com](http://www.Babiesclotheswholesale.com) captured on October 27, 2022.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this the 28th day of October, 2022 at Roseville, CA.

  
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Jenny Houston